

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF PAUL KROEGER IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION TO SAMSUNG'S
MOTION FOR ENTRY OF ESI ORDER**

I, Paul Kroeger, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC's Opposition to Samsung's Motion for Entry of ESI Order. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of the Motions Hearing Transcript from Headwater Research, LLC v. Samsung Electronics America et al., Case No. 2:22-CV-422-JRG-RSP, dated April 24, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2025, at Los Angeles, California.

/s/ Paul Kroeger
Paul Kroeger